

REMARKS

Status Summary

Claims 20-27, 29-31, 33-40, 42, 43, and 45-47 are pending in the present application. In this amendment, claims 20-27, 29-31, 33-40, 42, 43, and 45-47 are canceled, and claims 48-72 are added. Therefore, upon entry of this amendment, claims 48-72 remain pending.

Summary of Telephone Examiner Interview

Applicants acknowledge with appreciation the telephone interview granted by the Examiner to Applicants' representative, William E. Wooten, on January 10, 2011. In the Telephone Examiner Interview, the claims as amended and the cited references were discussed. In particular, Applicants' representative indicated that neither Applicants' Admitted Prior Art nor the cited references disclose, teach, or suggest providing a plurality of virtual routing functions, respective ones of the plurality of virtual routing functions being connected to respective ones of a plurality of interconnected VPNs such that each virtual routing function has an address in a private IP address space of a respective one of the plurality of interconnected VPNs. The Examiner indicated that Applicants' Admitted Prior Art failed to disclose, teach, or suggest the recited feature and that the claims as amended overcame the cited references. The Examiner noted that a subsequent search and review would be necessary before a Notice of Allowance is issued. The Examiner is invited to call

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Applicants' representatives, Gregory A. Hunt or William E. Wooten, at (919) 493-8000 to conduct a subsequent telephone interview to resolve any outstanding issues.

Claim Rejection – 35 U.S.C. § 103

Claims 20-27, 29-31, 33-40, 42, 43, and 45-47 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Applicants' Admitted Prior Art (hereinafter "AAPA") in view of U.S. Patent Application Publication No. 2002/0103931 to Mott, (hereinafter, "Mott."). This rejection is respectfully traversed.

Claims 20-27, 29-31, 33-40, 42, 43, and 45-47 are canceled. Accordingly the rejection is moot.

New Claims

New independent claims 48, 60, and 72 respectively recite a method, virtual private network (VPN) media proxy, and computer readable media for interfacing a VPN with a network having a different addressing scheme. For example, claim 60 recites a VPN media proxy comprising a communications interface for communicating with a first network and a second network, wherein the first network comprises a plurality of interconnected VPNs, the second network is connected to the plurality of interconnected VPNs via the first network, and the second network uses an Internet protocol (IP) addressing scheme different from a private IP network addressing scheme used by one of the plurality of interconnected VPNs. The VPN media proxy further comprises a routing module for providing a plurality of virtual

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routing functions, respective ones of the plurality of virtual routing functions being connected to respective ones of the plurality of interconnected VPNs such that each virtual routing function has an address in a private IP address space of a respective one of the plurality of interconnected VPNs. The VPN media proxy further comprises an address translation module for translating a destination IP address of a packet in accordance with the IP network addressing scheme of the second network. The VPN media proxy further comprises a communications module for forwarding the packet from a source IP address in the one of the plurality of interconnected VPNs to the destination IP address in the second network.

Support for new claims 48-72 is found in the instant specification. Support for claims 48, 60, and 72 is found, for example, in previously pending claims 20, 30, 39, and 47. Support for claims 49 and 61 is found, for example, in previously pending claims 21, 31, and 40. Support for claims 50 and 62 is found, for example, in previously pending claims 29, 33, and 42. Support for claims 51 and 63 is found, for example, in previously pending claims 22, 34, and 43. Support for claims 52 and 64 is found, for example, in previously pending claims 23 and 35. Support for claims 53 and 65 is found, for example, in previously pending claims 26, 27, and 38. Support for claims 54 and 66 is found, for example, in previously pending claims 26, 27, and 38. Support for claims 55 and 67 is found, for example, in previously pending claims 24, 36, and 43. Support for claims 56 and 68 is found, for example, in previously pending claims 25, 37, and 45. Support for claims 57 and 69 is found, for example, in previously pending claim 46. Support for claims 58 and 70 is found, for example,

in previously pending claim 46. Support for claims 59 and 71 is found, for example, in previously pending claims 27, 38, and 43. No new matter is added.

Each of claims 48, 60, and 72 recites providing a plurality of virtual routing functions, respective ones of the plurality of virtual routing functions being connected to respective ones of a plurality of interconnected VPNs such that each virtual routing function has an address in a private IP address space of a respective one of the plurality of interconnected VPNs.

There is absolutely no disclosure, teaching, or suggestion in AAPA of providing a plurality of virtual routing functions, respective ones of the plurality of virtual routing functions being connected to respective ones of a plurality of interconnected VPNs such that each virtual routing function has an address in a private IP address space of a respective one of the plurality of interconnected VPNs. On page 5, the Official Action indicates that AAPA discloses a VPN gateway providing a plurality of virtual routing functions, respective ones of said plurality of virtual routing functions being connected to respective ones of said plurality of VPNs such that each virtual routing function has an address in a private IP address space of a respective one of said plurality of VPNs. Applicants respectfully disagree.

Specifically, the Official Action cites Figure 2 and page 3, lines 4 – 7 and 21 – 23. However, nowhere does Figure 2 disclose a VPN gateway providing a plurality of virtual routing functions, much less providing a plurality of virtual routing functions, respective ones of the plurality of virtual routing functions being connected to respective ones of a plurality of interconnected VPNs such that each virtual routing

function has an address in a private IP address space of a respective one of the plurality of interconnected VPNs. This is most clearly illustrated by contrasting Figure 2 with Figure 3. Figure 2 depicts a plurality of NATs **46** and VPN interface routers **48** at the interface of the Carrier Data Network and the VPN Data Network. Page 3, lines 21 – 23, of the instant specification explains:

The carrier data network is coupled to each of the VPNs in the data networking environment by one or multiple NATs 46 (network address translator) and VPN interface routers 48. (See page 3, lines 21 – 23, of the instant specification.) (Emphasis added.)

The description of Figure 2 in the instant specification begins on page 3, line 14, and ends on page 4, line 22. Nowhere, does the description of Figure 2 mention a VPN gateway providing a plurality of virtual routing functions. In contrast to Figure 2, Figure 3 depicts a Media Proxy with VPN interfaces **250** and a VPN Gateway **100** located at the interface of the Carrier Data Network and the VPN Data Network, alongside the caption “Virtual Network Resources Per VPN.” Page 9, lines 29 – 34, of the instant specification explains:

This gateway can include a number of virtual routers which feed packets to the NAT function of the gateway if they are signaling packets destined for the call server **44**. The virtual router is effectively in the address spaces of other VPNs. Hence each VPN appears to have a dedicated call server, though it is actually a shared resource. (See page 9, lines 29 – 34, of the instant specification.) (Emphasis added.)

This passage clearly recites the “virtual routing functions” and does so in the context of Figure 3, which illustrates embodiments of the claimed subject matter. There is, however, no disclosure of “virtual routing functions” with respect to Figure 2.

Likewise, Mott lacks such disclosure, teaching, or suggestion. Mott is directed to a virtual private network that uses a domain name service (DNS) proxy to redirect a DNS inquiry from a first DNS server that cannot resolve the inquiry to a second DNS server that can resolve the inquiry. (See paragraph [0011] of Mott.) Nowhere does Mott mention a virtual routing function, much less providing a plurality of virtual routing functions, respective ones of the plurality of virtual routing functions being connected to respective ones of a plurality of interconnected VPNs such that each virtual routing function has an address in a private IP address space of a respective one of the plurality of interconnected VPNs.

Claims 49-59 depend from claim 48 and recite additional features. Claims 61-71 depend from claim 60 and recite additional features. As stated above with respect to claims 48 and 60, neither AAPA nor Mott disclose, teach, or suggest providing a plurality of virtual routing functions, respective ones of the plurality of virtual routing functions being connected to respective ones of a plurality of interconnected VPNs such that each virtual routing function has an address in a private IP address space of a respective one of the plurality of interconnected VPNs. Accordingly, it is respectfully submitted that claims 48-72 are patentable over AAPA in view of Mott.

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CONCLUSION

In light of the above amendments and remarks, it is respectfully submitted that the present application is now in condition for allowance, and an early notice to such effect is earnestly solicited.

If any small matter should remain outstanding after the Patent Examiner has had an opportunity to review the above Remarks, the Patent Examiner is respectfully requested to telephone the undersigned patent attorney in order to resolve these matters and avoid the issuance of another Official Action.

DEPOSIT ACCOUNT

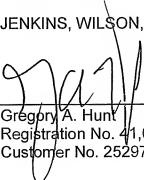
The Commissioner is hereby authorized to charge any fees associated with the filing of this correspondence to Deposit Account No. 50-0426.

Respectfully submitted,

JENKINS, WILSON, TAYLOR & HUNT, P.A.

Date: January 25, 2011

By: _____


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